



The Utah Division of Air Quality received comments from forty-nine members of the public during the public comment period for the Northern Wasatch Front State Implementation Plan for the 2015 ozone standard. All comments received were highly similar and were submitted using a standardized template. Below is an example of the comments received with the name of the commenter removed to protect the information of members of the general public.

To Whom It May Concern,

Thank you for the opportunity to comment on R307-110-13, Incorporation of Utah State Implementation Plan, Section IX.D.11: 2015 Ozone NAAQS Northern Wasatch Front Moderate Nonattainment Area. I am a Utah resident deeply concerned about the excessive levels of pollution caused by ground-level ozone in Utah.

Thank you for your dedication to maintaining and enhancing the quality of Utah's air through fair regulations. Although the Utah State Implementation Plan shows progress, I would like to raise some issues that could potentially trigger a federal implementation plan if not addressed.

I understand that there are ongoing efforts to apply for a 179B waiver to justify Utah's nonattainment ozone levels. However, this rule was intended for states that share international borders and should only be used if neighboring countries' ozone production affects the state. The EPA has ruled that Utah is not eligible for this waiver. Instead of pursuing this waiver, I suggest that we focus on finding solutions to our own ozone production by allocating our time, energy, and funds to regulating our own sources.

One way to address the issue of ozone emissions in Utah is to consider strengthening the state's bans on solvents. The NWF Ozone Moderate SIP report analyzed solvents on page 96 and determined that the current rule R307-357 aligns with the Ozone Transport Commission model rule. However, other states are proposing stricter regulations on solvents that emit VOCs, which are harmful precursors of ozone. To protect public health and the environment, Utah should conduct its own assessment of solvent risks and consider regulating them to avoid carcinogenic exposure. By taking action in these areas, Utah can further address the problem of ozone emissions.

It would benefit the Division of Air Quality to take preventative measures and collaborate with the new Great Salt Lake water commissioner to understand the link between the recently exposed lakebed and high ozone levels. Ongoing studies at the University of Utah suggest that interaction between the increased reflectance of the lakebed and chemicals in the air can result in the production of ozone that is then transported into urban areas.

To summarize, I appreciate the Division of Air Quality's efforts to create a plan that addresses our state's ozone issues. However, I believe that certain updates are necessary to ensure that the EPA views our plan as satisfactory and prevents federal intervention.

Thank you for your time and consideration.

Sincerely,